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July 31, 2001

Mr. Bill Hocutt
Chemist, Permitting Branch
Solid Waste Section
Division of Solid Waste Management
State of North Carolina Department of Environment and Natural Resources
1646 Mall Service Center
Raleigh, NC 27699-1646

Subject: J.S. Turner Saw Mill Site, Weldon
Coal Combustion By-Products
Structural Fill Beneficial Use Site
(13.5 Acre Section)

Dear Mr. Hocutt:

As a follow up to the recently submitted letter to Mr. Barnes addressing his concerns associated with the southern portion (11.5 acre section) of the J.S. Turner Saw Mill Site, we are submitting this letter to provide additional information regarding the northern portion (13.5 acres) of the site. We believe this package will address any remaining overall concerns you or Mr. Barnes may have that were discussed during the site visit on May 31, 2001, as well as satisfy your written letter dated June 7, 2001. In addition, we believe this information demonstrates the site is in compliance with the requirements of the Beneficial Use of Coal Combustion By-Products regulations and thus, should allow further study of the northern portion of the structural fill project site by the Solid Waste Division.

In response, we are providing the following information consisting of; written descriptions, documentation from other sources, and revised plan drawings indicating the pertinent information requested.

The written descriptions are as following:

- No excavation was performed on the northern portion of the site.
- All culverts used on site will be concrete, DOT approved, Class A.
- All of the 2:1 slopes noted on the site plans are dirt slopes.
- Based on your concern regarding groundwater/ash separation, we have constructed six test pits/excavations to determine more accurate groundwater elevations in several areas within the northern portion of the site. The two foot ash seasonal high water table separation criteria in the regulations will be met at all locations. Refer to the attached 13.5 Acre Site Location of Seasonal High Water Table Report.
- To eliminate the inconsistencies in elevations, the proposed final elevations of the ash fill area within the northern portion (as previously indicated within the southern portion) of the site have been accurately noted on the revised site plans.
- To eliminate the inconsistencies in the ash footprint, the proposed final footprint of the ash fill area within the northern portion (as previously indicated within the southern portion) of the site has been accurately noted on the revised site plans.
- To eliminate the inconsistencies of the contours, the proposed final contours of the ash fill area within the northern portion (as previously indicated within the southern portion) of the site have been accurately depicted on the site plans.
- To demonstrate that the project satisfies the siting requirement of a 100-foot distance from drinking water sources, the town records were surveyed for the six homes adjacent to the northern portion fill site to obtain names, addresses, and phone numbers. This survey was performed in conjunction with the Town of Weldon Water Department to ensure any pertinent information was identified. The water billing records were reviewed; in addition, the homeowners were contacted and interviewed. Based on these data sources, it was confirmed that no operable drinking wells are located on these properties, thus the 100-foot separation criteria will be met.
- The U.S. Army Corps of Engineers (Corps) made a site visit and determined the northern portion of the site does contain federal wetlands. This determination is stated in the completed Notification of Jurisdictional Determination Form (dated 7-3-01), and the locations of these wetlands are marked on the revised drawing, sheets 1, 4 and 5 of the site plans. This information is attached. The site plans also indicate that the wetlands will not be disturbed and show that the 50-horizontal feet distance criteria will be met.

The documents are attached and include:

13.5 Acre Site Location of Seasonal High Water Table Report
Drinking Water Survey Data
Corps Notification of Jurisdictional Determination

The revised plan drawings are attached and include:

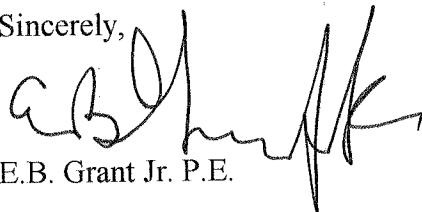
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| 1 of 10 | Overall Site Location |
| 2 of 10 | Existing Mill Yard (part of 13.5-Acre Access) |
| 3 of 10 | Existing Site 11.5 Acre Drying Yard |
| 4 of 10 | Existing Site Elevations (part of 13.5 Access Way) |
| 5 of 10 | Connection to Hwy 158, Existing Site (part of 13.5 Access Way) |
| 6 of 10 | Final Fill Elevations Mill Yard (part of 13.5 Acre Access Way) |
| 7 of 10 | Final Site – Proposed 11.5 Acre (part of 25.0 Acre site) |
| 8 of 10 | Final Site – Proposed part of 13.5-Acre Access Way |
| 9 of 10 | Proposed part of 13.5-Acre Access Way of Total 25.0 Acre |
| 10 of 10 | Details |

As we previously requested in our letter to Mr. Barnes (dated 7-18-01), we would like to utilize existing on-site soil from the northern side for use as project site the cover. Of course, this would require additional excavation, but the purpose would be strictly for cover and not for increased ash capacity. We estimate that approximately 37,700 cubic feet of excavated soil would be necessary for the 13.5 acre part of the site. Since the Requirements for Beneficial Use Coal Combustion By-Products regulations do not prohibit this construction technique, we believe the decision is at the discretion of the agency. Therefore, we formally request your consideration.

In conclusion, we believe this package will satisfy your information submittal request and demonstrate compliance within the northern portion (13.5-acre section) of the J. S. Turner Saw Mill Site. After review of this information and evaluation of the overall project, please confirm in writing that the agency is satisfied with this submittal, that project site compliance has been achieved, and thus, approval to proceed within the northern end of the project site is granted.

Please do not hesitate to call me at (252) 536-0203 if you desire additional information or have any questions.

Sincerely,



E.B. Grant Jr. P.E.

Cc: B. Barnes (w/o attachments)
Q. Morrison (w/o attachments)
M. Estrada